

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Re: Docket No. 16

**CERTIFICATION OF COUNSEL
REGARDING MOTION OF DEBTORS FOR
ENTRY OF AN ORDER (I) AUTHORIZING AND APPROVING
PROCEDURES TO REJECT OR ASSUME EXECUTORY CONTRACTS
AND UNEXPIRED LEASES, AND (II) GRANTING RELATED RELIEF**

The undersigned proposed counsel to Joann, Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On January 15, 2025, the *Motion of Debtors for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases, and (II) Granting Related Relief* [Docket No. 16] (the “Motion”) was filed with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Motion (the “Proposed Order”).

2. Pursuant to the *Notice of Motion of Debtors for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases, and (II) Granting Related Relief* [Docket No. 139] filed on January 17, 2025, a hearing on the Motion

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

was set to be held on February 11, 2025 at 2:00 p.m. (prevailing Eastern Time) and any objections or responses to entry of the Proposed Order were to be filed and served on the undersigned proposed counsel by February 4, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”), except for the Official Committee of Unsecured Creditors (the “Committee”) and certain of the Debtors’ landlords, whose deadlines were extended to February 6, 2025 at 5:00 p.m. (prevailing Eastern Time). The hearing on the Motion was subsequently adjourned to February 14, 2025 at 9:30 a.m. (prevailing Eastern Time).

3. Prior to the Objection Deadline, IG Design Group Americas, Inc. filed the *Limited Omnibus Objection of IG Design Group Americas, Inc. to Sale Procedures Motion and Contract Procedures Motion* [Docket No. 258] (the “IG Design Objection”). The Debtors received informal comments to the Proposed Order from: (i) the Office of the U.S. Trustee; (ii) the Committee; (iii) counsel to Edison & Company, (iv) counsel to WPG Legacy, LLC, (v) counsel to Clark Hill; (vi) counsel to Village West and Lynwood Center (vii) Barclay Damon LLP, as counsel to various landlords; (viii) Ballard Spahr LLP, as counsel to various landlords; (ix) Allen Matins Leck Gamble Mallory & Natsis LLP, as counsel to various landlords; and (x) counsel to Crafty (AL), LLC.

4. The Debtors have not received any other objections or other informal comments to the Motion and Proposed Order.

5. The Debtors revised the Proposed Order to address the IG Design Objection and the informal comments received, and the parties agreed to a revised Proposed Order, a copy of which is attached hereto as **Exhibit 1** (the “Revised Proposed Order”). A blackline comparing the Revised Proposed Order against the Proposed Order is attached hereto as **Exhibit 2**.

6. The Debtors respectfully request that the Court enter the Revised Proposed Order at its earliest convenience.

[Remainder of page intentionally left blank]

Dated: February 13, 2025
Wilmington, Delaware

/s/ Patrick J. Reilley

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